

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

UNITED STATES OF AMERICA

v.

CONSTANTINE VARSAMAS VARAZO, II

Defendant

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CASE NO. 4:21-CR-00032-CDL-MSH

SUMMARY OF TESTIMONY OF FORENSIC CHEMISTS
AS EXPERT WITNESSES

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the United States provides the following summary of testimony of expert witnesses Agatha Loose and Carmen Masters (“The Forensic Chemists”). The United States will offer expert testimony from Ms. Loose and Ms. Masters, forensic chemists with the Drug Enforcement Administration (DEA).

Forensic Chemist – Carmen Masters

Ms. Masters will testify that she has been a forensic chemist with the DEA since 2015. She has previously testified in different federal and state courts and has been qualified as an expert in the field of forensic chemistry. Ms. Master’s resume outlining her qualifications has been provided to defense counsel.

Ms. Masters will testify as to her education, training and experience in the fields of general and forensic chemistry. Ms. Masters will testify that she is trained and qualified to test controlled substances, including methamphetamine, and non-

controlled substances. Ms. Masters will testify as to the number of analyses on suspected illegal narcotic substances that she has performed and the methods used to determine the identity of the substances in question, including the use of the gas chromatography/mass spectrometry method, infrared spectroscopy method, and marquis color test method.

At trial, the Government expects Ms. Masters will testify that she analyzed the substances contained in sealed evidence bags that were marked as DEA exhibit 1, and identified the substances contained in the plastic bags seized on or about March 15-20, 2020. Ms. Masters will testify that she used a combination of tests, which she will explain, to identify the controlled substance.

Ms. Masters is able to testify as to the results of her analyses and testify regarding the quantity, quality and type of drugs found, based upon her education, experience and qualifications as a crime lab scientist and forensic chemist. The Government expects Ms. Masters to testify that she examined:

DEA Exhibit 1 which tested positive for Methamphetamine Hydrochloride with a net weight of approximately 194.36 grams and a purity level of approximately 98% which resulted in a finding of approximately 190.47 grams of pure substance.

A copy of Ms. Masters' report has previously been provided to counsel for Defendant in discovery.

Forensic Chemist – Agatha Loose

Ms. Loose will testify that she has been a forensic chemist with the DEA since 2019. She has previously testified in four (4) different federal and state courts and has been qualified as an expert in the field of forensic chemistry. Ms. Loose's resume outlining her qualifications has been provided to defense counsel.

Ms. Loose will testify as to her education, training and experience in the fields of general and forensic chemistry. Ms. Loose will testify that she is trained and qualified to test controlled substances, including heroin, and non-controlled substances. Ms. Loose will testify as to the number of analyses on suspected illegal narcotic substances that she has performed and the methods used to determine the identity of the substances in question, including the use of gas chromatography and the gas chromatography/mass spectrometry method.

At trial, the Government expects Ms. Loose will testify that she analyzed the substances contained in sealed evidence bags that were marked as DEA exhibit 2, and identified the substances contained in the plastic bags seized on or about March 15-20, 2020. Ms. Loose will testify that she used a combination of tests, which she will explain, to identify the controlled substance.

Ms. Loose is able to testify as to the results of her analyses and testify regarding the quantity, quality and type of drugs found, based upon her education, experience and qualifications as a crime lab scientist and forensic chemist. The Government expects Ms. Loose to testify that she examined:

DEA Exhibit 2 which tested positive for heroin with a net weight of approximately 27 grams.

A copy of Ms. Loose's report has previously been provided to counsel for Defendant in discovery.

Respectfully submitted, this 16th day of September, 2022

PETER D. LEARY
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CERTIFICATE OF SERVICE

I, C. Shanelle Booker, Assistant United States Attorney, hereby certify that on September 16, 2022, I electronically filed the within and foregoing **SUMMARY OF TESTIMONY OF FORENSIC CHEMISTS AS EXPERT WITNESSESS** with the Clerk of the Court using the CM/ECF system which will send notification to the Court and all counsel of record.

This 16th day of September, 2022.

PETER D. LEARY
UNITED STATES ATTORNEY

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